

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

BONITA A. POWERS, INDIVIDUALLY)	CASE NO. 1:22-cv-00198
AND AS EXECUTRIX OF THE ESTATE OF)	
JAMES C. POWERS, Deceased,)	JUDGE DAN A. POLSTER
)	
Plaintiff,)	
)	
v.)	<u>DEFENDANT THE CLEVELAND</u>
)	<u>CLINIC FOUNDATION'S RESPONSE</u>
)	<u>TO PLAINTIFF'S COUNSEL'S MOTION</u>
THE CLEVELAND CLINIC FOUNDATION,)	<u>TO WITHDRAW</u>
)	
)	
Defendant.)	

Defendant The Cleveland Clinic Foundation (“CCF”), by and through counsel, submits this response to “Plaintiff’s Counsel’s Motion to Withdraw Appearance Pursuant to Local Rule 83.9” filed on April 11, 2025 [ECF 29]. CCF has no objection to the relief sought by George R. Farneth II, Esquire and The Farneth Law Group, LLC in said Motion. However, CCF respectfully suggests that the proposed stay of 90 days [ECF 29 at ¶ 14] is excessive and, instead, should be more like 30 to 60 days to allow Plaintiff time to further consult with new counsel.

Dated: April 11, 2025

Respectfully submitted,

/s/ Edward E. Taber
Edward E. Taber (0066707)
Kelli R. Novak (0090647)
TUCKER ELLIS LLP
950 Main Avenue - Suite 1100
Cleveland, OH 44113
Telephone: 216.592.5000
Facsimile: 216.592.5009
E-mail: edward.taber@tuckerellis.com
kelli.novak@tuckerellis.com
Attorneys for Defendant
The Cleveland Clinic Foundation

CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically on April 11, 2025. Service of this filing is made pursuant to Fed. R. Civ. P. 5(b)(2)(E) by operation of the Court's electronic filing system upon all counsel of record.

/s/ Edward E. Taber

Edward E. Taber (0066707)

One of the Attorneys for Defendant

The Cleveland Clinic Foundation